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DAVID STEPHEN BANGS II

6  
7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,  
Plaintiff,

10 vs.

11 DAVID STEPHEN BANGS II,  
Defendant.

CASE NO.: 2:20-CR-00006-001-GMN-NJK  
  
JOINT STATUS REPORT AND  
STIPULATION TO CONTINUE TIME FOR  
SENTENCING

13 **JOINT STATUS REPORT AND STIPULATION TO CONTINUE TIME FOR**  
14 **SENTENCING**

15 Pursuant to this Court's June 30, 2020 Minute Order [ECF 11], the parties provide the  
16 following stipulation for the Court's consideration.

17 IT IS HEREBY STIPULATED AND AGREED by and between Jeremy Stanton Robbins,  
18 Special Assistant United States Attorney, Counsel for UNITED STATES OF AMERICA, and  
19 Maysoun Fletcher, Esq., Counsel for Defendant DAVID STEPHEN BANGS II, that the Sentencing  
20 Hearing currently scheduled for July 10, 2020 at 10:00 a.m. be vacated and reset to August 17, 2020,  
21 August 18, 2020, or a date and time thereafter that is convenient to the Court.

22 This Stipulation is entered into for the following reasons:

23  
24 1. In-Person Sentencing Hearing appearances are currently limited due to the Covid-19  
25 pandemic and the Parties would prefer to appear in person, if possible.

26 2. Counsel for the United States must travel from another State for the hearing and will  
27 need time to make travel arrangements once in person appearances are considered safe.  
28

1           3.       Mr. Bangs is out of custody on pre-trial release and has no objection to the request for  
2 continuance, after speaking with his counsel.

3           4.       Counsel for the United States has no objection to the continuance.

4           5.       Denial of this request for continuance could result in a miscarriage of justice.

5           6.       The additional time requested by this stipulation is excludable in computing the time  
6 within which trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States  
7 Code, Section 3161 (h)(1)(D) and Title 18, United States Code Section 3161 (h)(7)(A) considering  
8 the factors in Title 18, United States Code, Sections 3161 (h)(7)(B)(I) and 3161 (h)(7)(B)(iv).  
9

10          7.       For all the above-stated reasons, the ends of justice would best be served by a  
11 continuance of the current Sentencing Hearing.

12               This is the second request for continuance filed herein.

13               DATED: July 2, 2020.  
14

15               /s/ Jeremy Stanton Robbins  
16 **Jeremy Stanton Robbins, Esq.**  
Special Assistant United States Attorney  
17 400 South Virginia Street  
18 Reno, Nevada 89501

/s/ Maysoun Fletcher  
                  **Maysoun Fletcher, Esq.**  
5510 South Fort Apache Road  
Las Vegas, Nevada 89148  
Attorney for Defendant, David Bangs, II.

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9 Attorney for Defendant,  
10 DAVID STEPHEN BANGS II

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,  
14 Plaintiff,

15 vs.

16 DAVID STEPHEN BANGS II,  
17 Defendant.

CASE NO.: 2:20-CR-00006-001-GMN-NJK  
STIPULATION TO CONTINUE TIME FOR  
SENTENCING

18 **FINDINGS OF FACT**

19 Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court  
20 finds:

21 This Stipulation is entered into for the following reasons:

22 1. In-Person Sentencing Hearing appearances are currently limited due to the Covid-19  
23 pandemic and the Parties would prefer to appear in person, if possible.

24 2. Counsel for the United States must travel from another State for the hearing and will  
25 need time to make travel arrangements once in person appearances are considered safe.

26 3. Mr. Bangs is out of custody on pre-trial release and has no objection to the request for  
27 continuance, after speaking with his counsel.

28 4. Counsel for the United States has no objection to the continuance.

5. Denial of this request for continuance could result in a miscarriage of justice.

6. The additional time requested by this stipulation is excludable in computing the time  
within which trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States

1 Code, Section 3161 (h)(1)(D) and Title 18, United States Code Section 3161 (h)(7)(A) considering  
2 the factors in Title 18, United States Code, Sections 3161 (h)(7)(B)(I) and 3161 (h)(7)(B)(iv).

3 7. For all the above-stated reasons, the ends of justice would best be served by a  
4 continuance of the current Sentencing Hearing.

5 **CONCLUSIONS OF LAW**

6 Denial of this request for continuance could result in a miscarriage of justice.

7 **ORDER**

8  
9 IT IS HEREBY ORDERED that the Sentencing Hearing currently scheduled for July 10,  
10 2020 at 10:00 a.m., is continued to the 19th day August, 2020, at 11:00 a.m. in Courtroom 7D  
11 before Judge Gloria M. Navarro.

12 IT IS SO ORDERED.

13 DATED this 2 day of July, 2020.

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16 HONORABLE GLORIA M. NAVARRO  
17 U.S. DISTRICT COURT JUDGE  
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